UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

MARK HEARSH,)
Plaintiff,	
v.) Case No.: 08 CV 3100
MERCANTILE ADJUSTMENT BUREAU, LLC,	Judge Hibbler
Defendant.	

AGREED MOTION FOR AN ENLARGEMENT OF TIME

Defendant, Mercantile Adjustment Bureau, LLC ("MAB") by and through its attorneys, David M. Schultz and Corinne C. Heggie pursuant to Rule 6 and for its Agreed Motion for an Enlargement of Time to file its responsive pleading to plaintiff's Complaint, states as follows:

- 1. On or about May 29, 2008, plaintiff filed his Complaint against defendant alleging that defendant violated the Fair Debt Collection Practices Act, ("FDCPA").
- 2. Defendant was served on or about May 30, 2008. Defendant's responsive pleading was due Thursday, June 19, 2008.
- 3. Defense counsel was just retained and needs additional time to analyze the issues in this matter, confer with its client and prepare the appropriate response. Defense counsel is contemporaneously filing an appearance with this motion.
- 4. On June 23, 2008, defense counsel has discussed the additional time with counsel for the plaintiff and counsel for the plaintiff has no objection.
- 5. This time is not meant for the purpose of unnecessary delay and will not prejudice any party to the litigation.

WHEREFORE, Defendant, Mercantile Adjustment Bureau, LLC, requests that this Court grant it an additional 21 days, up to and including July 14, 2008, to file its responsive pleading to plaintiff's Complaint.

Respectfully Submitted,

<u>s/Corinne C. Heggie</u>
One of the attorneys for
Mercantile Adjustment Bureau, LLC

David M. Schultz Corinne C. Heggie HINSHAW & CULBERTSON LLP 222 N. LaSalle Street, Suite 300 Chicago, IL 60601-1081 312-704-3000